Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Administration of the	)	CC Docket No. 92-237
North American Numbering Plan	)	Phases One and Two

COMMENTS OF GTE

GTE Service Corporation,
on behalf of
GTE Telephone Operations,
GTE Mobilnet, Inc. and
Contel Cellular, Inc.

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SUMMARY

GTE agrees that the administration of the NANP necessarily involves four separate, but related, functions: policy-making; dispute-resolution; maintenance of number databases; and processing applications for numbers. Thus, GTE recommends that a new WZ1 Numbering Organization be established under the sponsorship of the Alliance for Telecommunications Industry Solutions comprised of an Oversight Committee, a Policy Committee, a new NANP Administrator, and the Industry Numbering Committee ("INC") and its associated workshops.

The Oversight Committee would coordinate activities within the WZ1 Numbering Organization and act as the forum of last resort within the organization, deciding on matters that could not be resolved by the other committees. The right of a participant to appeal an Oversight Committee decision to the appropriate forum would be preserved. The Policy Committee would work to resolve numbering related policy issues which have historically proven difficult, if not impossible, to resolve through general industry efforts. GTE recommends that the new North American Numbering Plan Administrator ("NANPA") be selected through a bid process under the auspices of the organization sponsor with input from industry participants. When necessary, the Oversight Committee would direct numbering issues to the INC where responsibility for working the issues resides.

The new WZ1 Numbering Organization should be funded through mandatory contributions from participants. GTE does not believe that the organization could operate effectively if it were dependent upon voluntary contributions. Under GTE's proposal, standard fees would be assessed to cover recurring administrative costs and in connection with numbering applications. The cost of special services would be borne by those benefiting from them.

With the advent of Interchangeable Numbering Plan Areas, GTE does not believe that the digit "1" can be used as a reliable toll indicator.

GTE is opposed to a six-year permissive dialing period in connection with the expansion of Feature Group D ("FGD") Carrier Identification Codes ("CICs"). Such a lengthy period would substantially affect dialing parity between service providers and would result in significant and unnecessary investments by local exchange carriers to accommodate the transition or a dramatic increase in post-dial delays experienced by customers. For technical reasons, the transition period must end once all of the 5000 and 6000 series of FGD CICs have been assigned and activated.

Finally, the GTE Telephone Operating Companies and the Regional Bell Operating Companies have already been saddled with regulatory restraints limiting their ability to compete freely for interstate interLATA business. Thus, any decision on whether or not to place another artificial restriction on them through mandated rerouting of interstate intraLATA business should be made at the time the decision to allow these parties entry into the interLATA market is made.

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GTE Service Corporation, on behalf of GTE Telephone Operations, GTE Mobilnet, Inc. and Contel Cellular, Inc. (collectively, "GTE"), hereby submits its Comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), FCC 94-79, released April 4, 1994, in the above-referenced proceeding.

BACKGROUND

In 1992, the Commission opened this proceeding with a Notice of Inquiry ("NOI")[1] which solicited comment in two phases. Phase 1 dealt with various aspects of the administration of the North American Numbering Plan ("NANP"), local number portability, and Personal Communications Services ("PCS").[2] Phase 2 addressed the need to expand Feature Group D ("FGD") Carrier

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1 Administration of the North American Numbering Plan, CC Docket No. 92-237, 7 FCC Rcd 6837 (1992).

2 The Commission decided (at ¶ 40) not to address PCS numbering issues in this docket and (at ¶ 42) to defer local number portability to a future proceeding.

Identification Codes ("CICs") from the current three digit format to a four digit format.

The NPRM is also divided into two phases. Phase One focuses on the identification of an entity to administer the NANP, future funding for NANP administration and suggested improvements to the overall process.[3] The Commission tentatively concludes "that ministerial administration of the NANP should be undertaken by a single, non-government entity."[4] The Commission seeks comment on "whether a new board should be created to assist in establishing numbering policy and resolving disputes, subject to oversight by this Commission and other regulators."[5] The Commission also seeks comment on various alternatives for the funding of the NANPA and how all industry participants within World Zone 1 ("WZ1") might be included. [6]

Phase One also addresses the use of the digit "1" as a nationwide toll indicator and the related issue of problems surrounding the use of non-uniform dialing arrangements.[7]

Phase Two addresses the expansion of CICs from three to four digits and the routing of interstate intraLATA "1+" dialed calls. The Commission, "persuaded by the comments that implementation of the . . . [CIC] . . . expansion

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3 See NPRM at ¶ 3.
4 NPRM at ¶ 14.
5 Id. at ¶ 4.
6 Bellcore, the current NANPA, has been funded by its owners, the Regional Bell Operating Companies ("RBOCs").
7 NPRM at ¶ 43.

plan should not be delayed,"[8] seeks comment on its tentative conclusion that it "should establish a transition period of six years for the expansion of FGD CICs to a four digit format."[9] Comment is also sought on whether the Commission "should require local exchange carriers to cease screening and completing interstate intraLATA '1+' MTS [Message Telephone Service] calls...."[10]

PHASE ONE

I. THE NEW WORLD ZONE 1 NUMBERING ORGANIZATION

a. General Overview

GTE supports the continued use of an integrated WZ1 numbering plan. As the Commission recognizes, the ability to dial anywhere within WZ1 without international access and country codes provides a seamless network for WZ1 customers.[11] There is no dispute that the benefits and efficiencies generated by the NANP are the envy of other non-WZ1 nations. Accordingly, any changes brought about by the departure of Bellcore as the NANPA must not interfere with the continued use of the NANP by the eighteen countries in WZ1.[12] This will require the active input and agreement of all WZ1 nations in resolving the administration and funding issues. Accordingly, any plan devised by the Commission should support the participation of these nations.

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8 Id. at ¶ 50.
9 Id. at ¶ 4.
10 Id. at ¶ 58.
11 See id. at ¶ 19.
12 Bellcore has requested the Commission to immediately initiate an industry process to transfer the NANPA function to another entity. (See Letter from George H. Heilmeir, Bellcore, to James H. Quello, FCC, dated August 16, 1993.)

GTE agrees that "overall administration of the NANP necessarily involves four separate, but related, functions: policy-making; dispute-resolution; maintenance of number databases; and processing applications for numbers."[13] Thus, GTE proposes that a new WZ1 Numbering Organization be established under the sponsorship of the Alliance for Telecommunications Industry Solutions ("ATIS"), comprised of an Oversight Committee, a Policy Committee, a new NANP Administrator, and the Industry Numbering Committee ("INC") and its associated workshops. Each committee would have open membership so that any entity with an interest in the use NANP resources could participate. The WZ1 Numbering Organization proposed by GTE would be structured as depicted in Figure 1 below.

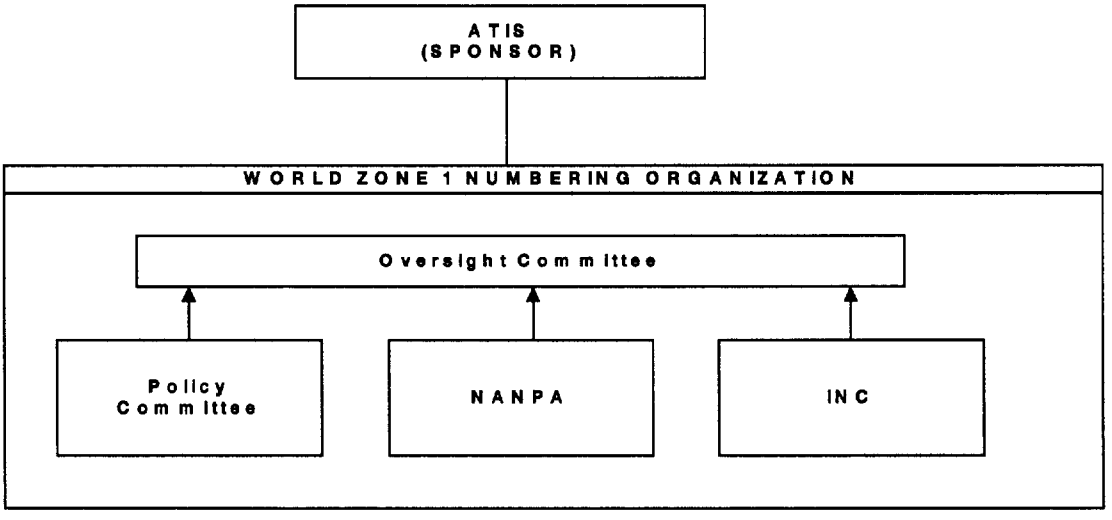

Figure 1
World Zone 1 Numbering Organization

[13] Id. at ¶ 7.

The WZ1 Numbering Organization initially would be patterned after Committee T1 and its administrative process. Obviously, there will be organizational differences between Committee T1 and the World Zone 1 Numbering Organization that will have to be resolved after establishment. The WZ1 Numbering Organization would determine procedures and processes to accommodate these differences.

The following general principles of operation would apply to each of the committees:

1. Committee decisions would be made on a consensus basis; i.e., unanimity would not be required. Decisions that could not be reached by consensus would be put to a vote. A resolution would only be adopted if it garnered a two thirds majority of eligible votes cast.

2. Rules would be established so that no entity or group of entities would be able to exert inordinate influence on any issue. Similar to the rules of Committee T1, committees would consist of organizations, companies, government agencies, individuals and others having a direct and material interest in the activities of the committee. And all interests would have the opportunity for fair and equitable participation without dominance by any single interest.

3. In all cases, final resolution for individual country issues would rest with the appropriate regulatory body in that particular country.

4. The right to vote on any committee would only be extended to participants that fund the WZ1 Numbering Organization.

5. Participant funding would be established at a level sufficient to cover the total cost of all functions undertaken by the WZ1 Numbering Organization.

GTE recognizes that the functions to be assumed by the WZ1 Numbering Organization are complex and that it is impossible to anticipate all contingencies. The responsibilities and operating structures of the various committees will have to evolve to accommodate the needs of the industry. GTE believes that the continued participation of the industry in shaping this evolution is the best course to the creation of a successful organization. In addition to the WZ1 Numbering Organization, GTE supports the continuation of existing industry efforts (such as the Future Numbering Forum) in the field of numbering.

b. Sponsorship of the World Zone 1 Numbering Organization

There are a number of reasons why an existing organization would be best suited to act as sponsor for the new WZ1 Numbering Organization, not the least of which is the elimination of start-up costs (e.g., office space, supplies and furniture). GTE's proposal includes ATIS as the sponsoring organization for the following reasons:

- ATIS is a recognized organization in the telecommunications industry, in the regulatory world, and in the area of technical standards. ATIS also has experience, as evidenced by its current sponsorship of committees in which Canadian and Caribbean organizations participate.
- ATIS is a non-profit organization (a preferred but not essential requirement).
- ATIS has a membership base comprised of a broad cross-section of service provider interest groups as well as manufacturers and general interest groups.
- ATIS serves as an umbrella organization for various other organizations, each of which has its own procedures and structures.
- ATIS' service as an effective sponsor of related technical organizations reflects its competence in this area.

A key provision of GTE's support for a sponsor is that the sponsor not be responsible, in any way, for any of the expenses incurred by the new WZ1 Numbering Organization. To do otherwise would place an undue burden on the sponsor's members and the industry committees they support.

c. The Oversight Committee

The Oversight Committee would assume an overall managerial function. It would (i) have overall responsibility for certain numbering activities in WZ1,[14] (ii) coordinate numbering activities, (iii) refer numbering issues to appropriate

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[14] Certain issues would continue to be the responsibility of other industry forums such as Committee T1, the Information Industry Liaison Committee and the Industry Carriers Compatibility Forum.

WZ1 Numbering Organization committees for resolution, and (iv) resolve any appeals of a committee decision.[15] The Oversight Committee would be established initially as an open membership committee. This would allow all industry participants to be represented, allaying any fears that any segment of the industry or WZ1 would not have input into the process. Ultimately, this committee may function more effectively if composed of a representative group of NANP participants. Such a modification, however would require a consensus of its existing members.

d. The Policy Committee

The Policy Committee would provide a much needed forum for the timely resolution of numbering related policy issues. The committee would be a significant addition to the industry numbering process as the resolution of certain numbering related public policy issues by industry forums has been a problem in the past. Without such a committee, the industry's only source for guidance would be the Commission or other regulatory bodies. In this regard, GTE believes that "[s]uch a . . . [committee] . . . might offer a less-burdensome alternative to existing policy-making . . . procedures."[16]

The Policy Committee would be an open industry forum in which the Commission and state regulators would have the option of participating. In addition, U.S. domestic carriers and users, WZ1 foreign carriers and users, and

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15 The resolution of any appeal by the Oversight Committee would be subject to further review by the appropriate regulatory agency and/or court.

16 NPRM at ¶ 25.

WZ1 foreign regulatory bodies also would be allowed to participate. Of course, in addition to participation in the WZ1 Policy Committee, a foreign WZ1 country would still have the option to establish a similar type committee within its own borders to address domestic policy issues. Such a country may wish to choose from its domestic committee a respresentative to serve on the Policy Committee.

The size, membership and overall staffing of the Policy Committee would be determined by the Oversight Committee. Once established, the Policy Committee would select its chairperson and determine its own rules of procedure.

e. The North American Numbering Plan Administrator

1. Selection of a New NANPA

GTE agrees that "no U.S. government agency is ideally suited to administer the U.S. portion of the NANP."[17] Therefore, GTE recommends that the sponsoring organization, with input from industry participants, develop and issue a Request For Proposal ("RFP") to select an entity to replace Bellcore as the NANPA. The RFP would include all of the functions to be performed and qualifications required.

GTE further agrees that the transition from Bellcore to the new NANPA "should begin as soon as the new administrator is identified, and that it should extend to a date at least six months after the change to INPAs [Interchangeable Numbering Plan Areas] in January 1995."[18] It is critical that the transition be as

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17 Id. at ¶ 14.

18 NPRM at ¶ 17 (emphasis added).

least disruptive as possible, but long enough to insure that the new entity is fully prepared to assume its responsibilities. Administration of the NANP is simply too important to allow any lapse between Bellcore and the new administrator.

2. Responsibilities of the New NANPA

GTE proposes that the new NANPA assume all functions presently handled by Bellcore, the current NANPA (with the exception of numbering policy which would be handled by the Policy Committee). Bellcore describes[19] its functions as follows:

1. administering numbering resources for WZ1 fairly and impartially;
2. working with standards bodies, industry forums, national and international organizations, and appropriate governmental agencies; *e.g.,* the Canadian Department of Communications and Caribbean administrations, as a means of achieving consensus on administrative procedures and design changes;
3. ensuring that conservation techniques are employed in the assignment and utilization of NANP resources;
4. ensuring the availability of NANP resources for legitimate applications;
5. adapting the NANP to the changing requirements of the telecommunications industry; and

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[19] Bellcore, North American Numbering Plan Administrator's Proposal on the Future of Numbering in World Zone 1, January 2, 1992, at pp. 5-6.

6. representing NANP interests to national and global standards and telecommunications bodies.

In addition to the foregoing, the processing of applications should also be transferred to the new NANPA. The WZ1 Numbering Organization can reassign, at a later date, some of these functions (e.g., numbering policy) to other committees within the WZ1 Numbering Organization.

The Commission tentatively concludes that the new NANPA should also "perform the additional functions associated with the assignment of CO [Central Office] codes."[20] GTE would be willing to relinquish its responsibility for assigning CO codes[21] as long as the entity assuming this responsibility continues to follow the Central Office Code (NNX/NXX) Assignment Guidelines (ICCF-93-0729-010) and the Numbering Plan Area ("NPA") Code Relief Guidelines.[22]

The prospect of centralizing this function, however, raises serious concerns. The proper assignment of CO codes requires a comprehensive understanding of the current state of a local network as well as its plans for the future. This is particularly important when an NPA code split or overlay is required. The lack of such knowledge could result in premature NPA splits -- a mistake extremely costly to the public and to all service providers. In addition,

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20 Id. at ¶ 29.

21 GTE presently assigns CO codes in the 808 and 813 NPAs.

22 The NPA Code Relief Guidelines are being developed by the NPA Code Relief Planning Workshop under the auspices of the Industry Carriers Compatibility Forum ("ICCF") of the Carrier Liaison Committee.

many of the factors directly affecting the assignment of numbers locally are associated with state or local government and regulatory activity. Accordingly, the CO administrator must be current on all the unique state and local rules, regulations and issues. The ability to stay on top of this information must be preserved under any centralization plan that might be adopted.

3. Reporting Structure of the New NANPA

The new NANPA, like the Policy Committee, would receive assignments and direction from, and report to the Oversight Committee. It is critical that the NANPA report to the Oversight Committee since it will be this committee that will be coordinating the resolution of contentious issues. In addition, the NANPA budget would require Oversight Committee approval.

4. Staffing of the New NANPA

Staffing of the NANPA would have to be deferred until after the universe of functions assigned to it is established. Tentatively, those functions would include the assignment of NPA codes, CIC codes, vertical service codes, Service Access Codes ("SACs"), N11 codes, CO codes for NPA 809, and 800 and 900 SACs.[23] They would also include the administration of Signaling System 7 ("SS7") network address codes and Automatic Number Identification ("ANI") digits, as well as conducting the yearly Central Office Code Utilization

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[23] With the Commission's release of the 500 SAC for PCS, the entity replacing Bellcore will be responsible for assigning CO codes within the 500 SAC. (See, Letter from A. Richard Metzger, Jr., Acting Chief, Common Carrier Bureau to Ronald R. Conners, Director of NANP Administration, dated May 3, 1994.)

Survey. An additional function likely to be assumed is the assignment of Intermediate Signaling Network Identifier ("ISNI") codes and numbers for the Public Switched Digital Service ("PSDS").[24] And if the Commission, as it proposes, adds the assignment and administration of CO codes to the NANPA, its staff will have to be significantly larger than Bellcore's current group.

f. Funding of the New World Zone 1 Numbering Organization.

Adequate funding for the new WZ1 Numbering Organization will be critical, not only to its effectiveness, but also to its very survival.[25] This has not a problem for Bellcore because its client companies have consistently provided the necessary funding. The new WZ1 Numbering Organization must have the same assurance that funding will always be sufficient to cover its needs. However, if it is to remain effective over time, it cannot be dependent on any other organization for funds. In addition, the funding method ultimately selected must be fair and equitable, and include as contributors "those who are assigned telephone numbers and those who otherwise directly benefit from NANP administration."[26]

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24 NPRM at n. 39.

25 It does not appear that the Commission would be able to assess regulatory fees to fund such an organization under the Omnibus Budget Reconciliation Act of 1993 ("Act"). For one thing, there is no mention of outside contracting in the Act. More importantly, the formula for setting fees uses Commission labor costs, rather than market labor costs, as a factor. (Section (b)(1)(A).) (Another indication that the fees were intended to be limited to functions actually performed by the Commission.) Thus, given the disparity between labor costs in the public and private sector, it is not likely that sufficient funds could be generated from regulatory fees in any event.

26 Id. at ¶ 36.

GTE agrees with the Commission's assessment that "voluntary contributions could result in fluctuating incomes which, in turn, could frustrate budget and other operational planning."[27] For this reason, GTE is opposed to any system of voluntary contributions from U.S. participants.[28]

GTE supports a system of cost-based charges for number administration to be established with the participation of other WZ1 regulators. In many cases, the NANPA spends very little time working on numbers already allocated or assigned and spends a great deal of time investigating issues pertaining to new services or new service providers' requests for numbers. GTE's position is that NANP funding should match cost causation. Certain costs associated with the administration of the NANP should be covered by a flat fee assessed to all parties either receiving numbers or benefiting from the NANPA's activities. There also should be a usage-based fee; *e.g.*, time and materials, for each request submitted to the NANPA. For example, a charge should apply to requests for codes made to the NANPA even if the codes are not issued, as the processing of the request still consumes NANPA resources.

II. THE DIGIT "1" CANNOT BE USED RELIABLY AS A TOLL INDICATOR

In the past, the GTE Telephone Operating Companies ("GTOCs") have supported the designation of the digit "1" as a toll indicator. However, the Commission should be aware that with the advent of INPAs, the digit "1"

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27 Id. at ¶ 35.

28 GTE does recognize, however, that voluntary contributions may be the only alternative with respect to other WZ1 countries.

generally will indicate to switching systems that 10-digits should follow, which may or may not signify a chargeable toll call to the dialing customer. Therefore, the digit "1" cannot be used as a reliable indicator to the dialing customer that toll charges will apply on all "1+" dialed calls.

PHASE TWO

I. THE PERMISSIVE DIALING PERIOD FOR CIC EXPANSION SHOULD NOT BE EXTENDED TO SIX YEARS

The Commission's proposal to establish a permissive dialing period of six years for the transition of Feature Group D ("FGD") Carrier Identification Codes ("CICs") from three to four digits is unacceptable. For the reasons discussed below, the permissive dialing period must end after the "5XXX" and "6XXX" series of CICs have been assigned and activated. If it does not, LECs will be required to make large, unwarranted investments in switching, database, and billing system modifications or dialing parties will experience a significant increase in post-dial delay. In addition, dialing parity will cease to exist as entrenched service providers will enjoy an unearned competitive advantage over their newer competitors through the formers' retention of a five-digit Carrier Access Code ("CAC").

a. A Six Year Permissive Dialing Period Would Require Significant and Unwarranted LEC Investment or an Unacceptable Increase in Post-Dial Delay.

The industry has expended much time and effort determining the best method of implementing four-digit Carrier Identification Codes ("CICs"). Primary goals were to make the transition easy for the dialing public and to keep the

costs of implementation as low as possible. With the exception of the time allowed for permissive dialing,[29] a transition plan had been developed and agreed upon by most of the industry. It included the following three stages:

1. In order to start the conversion, switching systems would prefix any three-digit CIC ("XXX") with a zero to form a four-digit CIC ("0XXX"). This stage still would limit the number of CICs to 969.
2. Assignment of four-digit CICs in the series of "5XXX" and "6XXX" would be made. This capability would be made possible because no three-digit CICs would have been assigned in the 10X, 15X, or 16X series of codes; therefore, switching systems could still perform translations and routing without invoking timing to determine end-of-dialing. In this stage, the number of CICs would be expanded to 2,969.
3. After all the "5XXX" and "6XXX" series have been assigned, the nation would convert to four-digit CICs and three-digit CICs would no longer be accepted by switching systems. Once accomplished, the number of available CICs would increase to 10,000.

It is the third stage that would be dramatically affected by a decision to set a six year permissive dialing period. The new Carrier Access Code ("CAC")[30]

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29 Permissive dialing allows a customer to selectively dial the old format or the new format.

30 A CAC is the digits dialed by a customer to access a preferred service provider. The CAC format to be replaced is "10XXX," with the "XXX" being the CIC. The new CAC will have a format of "101XXXX," with an expanded CIC of four digits ("XXXX"). The CIC code is currently used to

was specifically assigned to allow the permissive use of three- or four-digit CICs to provide time for the nation to technically migrate to four digits. All switching systems must be able to differentiate between these two dialing patterns. The migration plan developed by the industry for this transition period allows Access Tandems ("ATs") to accept CICs from some End Offices ("EOs") on a three-digit basis and from other EOs on a four-digit basis. Every CAC that is dialed must be examined to determine what digits appear in the third and fourth positions. If they are "10," "15" or "16," then the switch recognizes that a seven digit CAC has been dialed. Any other numbers in these positions will indicate to the switch that a five-digit CAC has been dialed. For technical reasons, when all CICs in the "5XXX" and "6XXX" series have been assigned, the permissive dialing period must end. If the permissive dialing period does not end, major costly switching systems modifications will be required[31] or the dialing customer will experience significant post-dial delay in the processing of calls.

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identify customers who purchase Feature Group B ("FGB") and/or FGD access services. This code is used for routing from the local exchange network to the access purchaser, and for billing between the LEC and the access purchaser.

31 Switching systems will no longer be able to determine what the dialing sequence indicates by examining the third and fourth digits. Therefore, modifications will be required for Stored Program Control ("SPC") EOs, ATs, Switching Service Points ("SSPs"), Operator Service Systems ("OSSs"), Database Systems, Service Management Systems ("SMSs"), and billing systems. See, GTE Reply Comments Appendix A, Administration of the North American Numbering Plan, Notice of Inquiry, CC Docket No. 92-237 Phase 2 (Feature Group D Access Codes), January 27, 1993. (This Appendix is attached to these comments for ease of reference.)

Post dial delay is maintained at current levels through the use of overlap outpulsing to the IXCs. Overlap outpulsing allows pulsing to the IXC to start after receipt of all but the last four or seven digits from the dialing customer.[32] However, overlap outpulsing will not be possible if CICs other than the "5XXX" and "6XXX" series are assigned and permissive dialing is still permitted. As illustrated in the example included in Attachment A, the absence of overlap outpulsing would result in the dialing party experiencing approximately a four second additional post-dial delay.[33] This delay is completely unacceptable.[34] GTE firmly believes that the dialing public and all service providers can complete required changes and enhancements in a timeframe much shorter than six years.

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32 If the end office is performing three-digit translations, pulsing starts after the customer dials the NPA code. If the end office is performing six-digit translations, pulsing starts after the customer dials the NXX code.

33 See Attachment A for an example of the timing differences between a call that is processed with overlap outpulsing and one that requires the end office to wait for an end-of-dialing determination.

34 As indicated in the discussion in Appendix A, the only way to avoid this result would be for the LECs to modify their switching, billing, and data base systems. This would require, however, a significant investment with no correlating potential for cost recovery. However, the Commission (at note 74) believes that an examination of exogenous cost treatment for LECs associated with CIC expansion is "outside of the scope of this proceeding" and has declined "to interpret or reconsider rules in this docket." GTE believes that the Commission must address this issue in this docket should LECs be required to make uneconomic investments based on the Commission's decision to impose a six year permissive dialing period.

Moreover, the proposed six year period cannot be reconciled with previous Commission action.[35] In adopting a nationwide system of 800 database access, the Commission concluded that a temporary increase in access delay for a small percentage of 800 calls would be acceptable. However, the Commission required that the delay be reduced to the original 800 NXX system level within only two years of implementation. In contrast, the proposed six year permissive dialing period for CICs would create an average access time delay almost twice that of the 800 NXX system, for a period three times as long, and for all calls dialed on an access code basis.

GTE urges the Commission to reconsider its proposal to establish a transition period of six years. Although GTE understands the Commission's concern about the "hardships imposed on pay phone providers, manufacturers, and PBX users,"[36] the Commission cannot ignore the financial impact on the LECs created by extending the permissive dialing period past the time when all "5XXX" and "6XXX" CICs have been assigned. The LECs already have experienced significant costs related to the transition to four-digit CICs. It is patently unfair to require them to make significant, additional investments to accommodate the inability of other industry parties to stick to a plan that has been discussed in detail for years. Rather than taking the steps necessary to

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35 It is also at odds with GTE's obligation to maintain dialing parity for all interexchange carriers that obtain access from the GTOCs. The RBOCs have a similar obligation. See GTE Consent Decree, Appendix B, ¶ A.3(c); RBOC Modified Final Judgment at A.2(iii).

36 See, NPRM at ¶54.

ready themselves for the transition, these parties have focused their efforts on convincing the Commission that additional delays are necessary.[37]

b. A Six Year Permissive Dialing Period Would Result In An Unearned Competitive Advantage for Entrenched Service Providers.

A six year permissive dialing period would reintroduce dialing parity issues to the industry by giving service providers with three-digit CICs an unearned competitive advantage over their newer rivals.[38] Customers of service providers with four digit-CICs will be required to dial two additional digits. The power of this factor in influencing the arguments of many commenters should not be underestimated by the Commission. The desire of a competitor to obtain any six-year advantage over a rival in today's ever-changing industry can be nothing short of compelling. The industry's momentum toward a more openly competitive environment dictates that the Commission not allow a straightforward implementation issue such as this to be exploited to further the anti-competitive goals of a few.

II. INTERSTATE INTRALATA TOLL CALLS

The Commission seeks comment "on whether . . . [it] . . . should require local exchange carriers to cease screening and completing interstate intraLATA

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37 As the Commission notes, one commenter has suggested what, in effect, would be an unending transition period. (NPRM at ¶ 53.)

38 The 800 NXX system exhibited an average access delay of approximately 2.5 seconds. The Commission permitted a temporary increase in this time of 1.6 seconds for many 800 calls. See Provision of Access for 800 Service, CC Docket No. 86-10, Memorandum Opinion and Order on Reconsideration and Second Supplemental Notice of Proposed Rulemaking, 6 FCC Rcd 5421, 5425-26 (1991).